

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO: 1:16CR277
	:	
Plaintiff,	:	
	:	JUDGE DAN A. POLSTER
-VS-	:	
	:	
OLIVER DRAGIC,	:	<b><u>DEFENDANT'S UNOPPOSED</u></b>
	:	<b><u>MOTION TO RESCHEDULE</u></b>
	:	<b><u>SENTENCING</u></b>
Defendant.	:	

Defendant, through counsel, respectfully moves this Court to reschedule the sentencing hearing presently scheduled for May 31, 2018, at 9:30 a.m. Mr. Dragic has received his travel documents from the Bosnia Consulate. These documents are valid until June 17, 2018. He has his airplane ticket to depart on June 12, 2018. Defense counsel has a pretrial hearing scheduled before Judge Adams on May 31, 2018, at 10:00 a.m. in a multi-defendant case. (*United States v. Brian Peacock, et al.*) Defense counsel requests that Mr. Dragic be rescheduled, if the Court is available, for either May 29, 2018, or the afternoon of May 30, or 31<sup>st</sup>, or June 1<sup>st</sup>.

Defense counsel has discussed this matter with Assistant U.S. Attorney Om Kakani. He advised that the government has no objection to this request and that the above-referenced dates and times are acceptable.

For these reasons, Mr. Dragic requests that the Court grant this motion.

Respectfully submitted,

STEPHEN C. NEWMAN  
Federal Public Defender  
Ohio Bar: 0051928

/s/ *Darin Thompson*

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 24, 2018, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic receipt. All other parties will be served by regular U.S. mail.

/s/ Darin Thompson

DARIN THOMPSON

Assistant Federal Public Defender